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FILED

IN THE CIRCUIT COURT FOR DAVIDSON COUNTY, TENNESSEE
AT NASHVILLE

2017 JUN 19 AM 9:29

LEVI N. THOMAS,

Plaintiff,

v.

GREYHOUND LINES, INC. and
FIRSTGROUP AMERICA, INC.,

Defendants.

RICHARD R. ROOKER, CLERK

[Signature]

D.C.

NO. 176491
JURY DEMAND

COMPLAINT

Comes Plaintiff Levi N. Thomas, through counsel, and brings the above-styled action against Defendants Greyhound Lines, Inc. and FirstGroup America, Inc. for compensatory damages, and would show:

1. Plaintiff is a citizen and resident of Nashville, Davidson County, Tennessee.
2. Defendant Greyhound Lines, Inc. is a Delaware corporation licensed to conduct business in the state of Tennessee with a Tennessee Registered Agent of CT Corporation System at 800 Gay Street, Suite 2021 Knoxville, Tennessee 37929-9710.
3. Defendant FirstGroup America, Inc. is a Delaware corporation licensed to conduct business in the state of Tennessee with a Tennessee Registered Agent of CT Corporation System at 800 Gay Street, Suite 2021 Knoxville, Tennessee 37929-9710.
4. The accident that is the subject of this lawsuit occurred in Davidson County, Tennessee.
5. On or about June 21, 2016, Plaintiff was in the course and scope of his employment with US Security Associates, performing his duties as a security guard at Greyhound, when the

brakes of a Greyhound bus ([REDACTED]) popped causing the bus to shoot in a forward motion pinning the Plaintiff between the bus and a metal barrier.

6. As a proximate result of Defendants' negligence and the Plaintiff being pinned between the bus and a metal barrier, Plaintiff suffered permanent injuries to his body that have caused him severe physical pain, and that have interfered with his ability to work and enjoy his life.

7. The proximate cause of Plaintiff's injuries, damages, and suffering was the negligence of Defendants, who were negligent by knowingly failing to mechanically maintain the bus in a proper manner creating a dangerous condition, failing to correct a dangerous condition by allowing the bus to continue in operation when they knew or should have known of its deteriorating mechanical condition, failing to ensure the bus was safe for the general public and employees, failing to warn the public and employees that the bus created a dangerous condition, and failing to adequately supervise its employees and/or agents to prevent the bus from creating a dangerous condition.

8. All of the foregoing acts of negligence, either alone or combined, were the cause of Plaintiff's injuries, damages, and suffering.

9. Plaintiff has incurred numerous expenses for medical, doctor, hospital, and other services.

10. Plaintiff has lost income and incurred expenses due to his inability to work.

11. Plaintiff has suffered a diminished capacity to enjoy his life.

12. Plaintiff has suffered and continues to suffer pain as a result of his injuries.

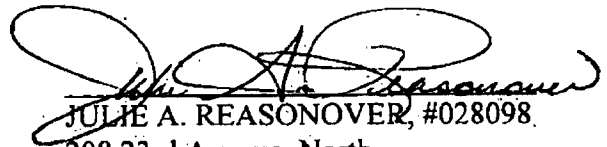
13. All of Plaintiff's injuries are due to Defendants' negligence.

WHEREFORE, Plaintiff prays for the following relief:

- (1) A judgment for compensatory damages for Plaintiff against Defendants in an amount to be determined by the jury and this Honorable Court;
- (2) A jury for the trial of this cause; and
- (3) An award of all discretionary costs, court costs, and such other and further relief as shall be deemed reasonable and necessary.

Respectfully Submitted,

REASONOVER LAW FIRM



JULIE A. REASONOVER, #028098

208 23rd Avenue, North
Suite 201

Nashville, TN 37203

(615) 241-0405 phone

(615) facsimile

julie@reasonoverlaw.com